

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES OF AMERICA)	
)	
VS)	CRIMINL ACTION
)	FILE NO.: 1:11-CR-218
VINCENT LAMAR HALL,)	
Defendant)	

MOTION FOR RECONSIDERATION OF PRETRIAL DETENTION

COMES NOW THE DEFENDANT by and through his undersigned counsel and files this Motion for Reconsideration of this Honorable Court's decision to detain the Defendant prior to trial and shows the following:

1. The Defendant, facing narcotic charges, was initially granted a bond by the Magistrate Court.
2. Upon the Government's motion and prior to the Defendant's release, said bond was revoked and the Defendant was ordered detained.
3. Since detention, new information has evolved regarding this matter.
4. Since detention, the Defendant has suffered no less than nine physical episodes of the physical manifestation of sever type II diabetes; specifically the defendant has lost consciousness for several seconds to several minutes, each episode becoming more pronounced than the prior.

5. Since detention, one of the codefendants, specifically Defendant Cook, who is similarly situated as this defendant, after being denied a bond by the Magistrate Court was granted a bond by this Honorable Court.
6. Since detention, this Defendant has suffered severe financial loss, specifically the loss of his home among other issues.
7. Since detention, this Defendant has lost most financial resources as demonstrated by the fact that the Defendant maintains appointed counsel.
8. As no large sums of cash nor narcotics were found on the Defendant or in his home, Defendant asserts, under oath if necessary, that he will appear for all hearings as well as trial should he be granted a bond, as he feels he has a chance of success at trial.
9. All weapons belonging to the defendant have been seized as well as the surrender of any passports or travel privileges.
10. Defendant has community ties as well as a network of associates and friends who will help to ensure defendant's appearance at the Court's request.

WHEREFORE, this Defendant respectfully prays that this Honorable Court grant this Defendant an opportunity to be heard and that this Court reconsider it's decision to deny this Defendant bond.

This the 21st day of September, 2011.

Respectfully submitted,

Rolf A. Jones,
Counsel for the Defendant Vincent L. Hall

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CERTIFICATE OF SERVICE

I hereby certify that I have prepared the foregoing Motion to Continue Suppression Hearing in compliance with the Court's Local Rules and that a true and correct copy of the foregoing was served electronically via ECF to counsel shown below this 21th day of September, 2011 to:

Cassandra J. Schansman, Assistant United States Attorney

All co-Defendants counsels

Respectfully submitted,

Rolf A. Jones,

Attorney for Defendant

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